

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF OREGON**

In re

TOMMY L PROFIT

) Case No. 319-34084-PCM13
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**TRUSTEE'S OBJECTION TO
CONFIRMATION AND MOTION
TO DISMISS**

Debtor(s).)

Wayne Godare, the Standing Chapter 13 Trustee Objects to Confirmation of the above case for the reason(s) set out below:

- a. Plan is not feasible:
- b. Case/Plan is not proposed in good faith or is forbidden by law:
- c. Plan does not commit all of debtor's excess projected disposable income pursuant to 11 U.S.C. §1325(b)(1)(B) for the applicable commitment period:
- d. Plan does not meet the best interest test of 11 U.S.C. §1325(a)(4):
- e. Filing/documentation is deficient: **as requested at the §341(a) hearing, please provide the Trustee with:**
 - 1. Verification that the Debtor has registered for TFS;
 - 2. A signed true copy of the Debtor's 2018 Federal and State Tax Returns;
 - 3. Two full months of pay stubs for the Debtor and the Debtor's non-filing spouse; and
 - 4. A copy of the Debtor's bank statements listed on Schedule A/B that includes the balance on the date of filing and 30 days of transaction history.
- f. Other: **as requested at the §341(a) hearing, in ¶2 please strike the "60" from the blank.**

If by the time of the scheduled confirmation hearing, debtor fails to take all necessary steps to satisfy each objection marked above, or is not prepared to address the Trustee's objections with the filing of an amended plan as directed by the court during that scheduled confirmation hearing, the Trustee may, in his discretion, urge the court for an order dismissing the case without further notice.

I certify that on December 4, 2019, copies of the above Objection and Motion were served on the debtor(s) by first class mail and any debtor(s) attorney by ECF.

DATED: December 4, 2019

/s/ Wayne Godare, Trustee

W GEORGE SENFT
(mk)